

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA**

In re: Frank Scott Dabney and Kathryn  
Harralle Dabney,

Debtors,

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Frank Scott Dabney and Kathryn Harrelle  
Dabney,

Plaintiffs,

v.

Bank of America, N.A; Specialized Loan  
Servicing, LLC; Shellpoint Mortgage  
Servicing; and The Bank of New York  
Mellon,

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Defendants.

Core Proceeding Case No.: 13-04227-JW

Adv. Case No.: 17-80037-jw

**MOTION FOR EXTENSION TO  
RESPOND TO WRITTEN  
DISCOVERY REQUESTS BY  
DEFENDANTS SHELLPOINT  
MORTGAGE SERVICING AND THE  
BANK OF NEW YORK MELLON**

Defendants Shellpoint Mortgage Servicing (“Shellpoint”) and The Bank of New York Mellon (“The Bank of New York”) (hereinafter sometimes collectively referred to as “Defendants”) hereby move for an Order granting them a twenty-one (21) day extension to respond to Plaintiff’s Interrogatories, Requests for Production, and Requests for Admissions served via U.S. Mail on March 6, 2019. The responses are currently due April 8, 2019, which includes the three (3) day extension for responses due when served by mail. The undersigned requested a twenty-one (21) day extension from Plaintiffs’ counsel on April 5, 2019, but no response has been received at the time of filing. The grounds for the request is that the undersigned is still gathering information from the clients to respond to the discovery requests. The new proposed date for the responses is April 29, 2019.

Wherefore, these Defendants respectfully request an Order granting them a twenty-one (21) days extension to serve their responses to Plaintiffs' written discovery requests making the responses due on or before April 29, 2019.

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RILEY POPE & LANEY, LLC

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Columbia, South Carolina

April 8, 2019